

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RICHARD BEHAR,

Plaintiff,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY,

Defendant.

No. 17 Civ. 8153 (LAK)

18 Civ. 7516 (LAK)

PLAINTIFF'S CROSS-MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE THAT, upon the Memorandum of Law in Support of Cross-Motion for Summary Judgment and in Opposition to the Government's Motion For Summary Judgment, upon the Declaration of Charles Crain, including all the exhibits appended thereto, and upon the accompanying Statement of Material Facts, Plaintiff Richard Behar, by his attorney, David Schulz, will move this Court before the Honorable Lewis A. Kaplan, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an Order granting Plaintiff summary judgment and denying Defendant summary judgment in the above-captioned actions pursuant to Federal Rule of Civil Procedure 56.

Dated: December 6, 2019
New Haven, Connecticut

Respectfully submitted,

By: /s/ David Schulz
David Schulz, supervising attorney
Charles Crain, supervising attorney
Anna Windemuth, law student intern
Sara Worth, law student intern
MEDIA FREEDOM &

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